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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20054  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Implementation of the )  
Telecommunications Act of 1996 )  
 )  
Reform of Filing Requirements )  
and Carrier Classifications )

CC Docket No. 96-193

DOCKET FILE COPY ORIGINAL

COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint") on behalf of the Sprint Local Telephone companies and Sprint Communications Company L.P., hereby submits Comments in response to the Notice portion of the Commission's September 12, 1996 Order and Notice of Proposed Rulemaking ("ONPRM") in the above-captioned docket.

In ONPRM, the Commission modified its rules to permit LECs to file revisions to their cost allocation manuals ("CAMs") on an annual basis rather than quarterly or semi-annually. This modification was made to implement Section 402(b) of the 1996 Act.<sup>1</sup>

In light of this modification and Section 402(b)(2)(B), the Commission seeks comment on whether it should amend Section 64.903(b) of its rules to eliminate the requirement that LECs file certain changes to the CAMs (changes to the cost apportionment table and to the description of time reporting

1. Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996) (the "1996 Act").

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procedures) sixty days prior to implementation of the change. If this 60 day notice provision is eliminated, the ability of a carrier to modify its CAM between annual filings, without being forced to seek a waiver of the Commission's rules, would be eliminated.

Sprint agrees with the Commission's tentative conclusion that the 60 day notice provision should be retained. As the Commission notes, the 60 day notice provision enables the Commission to "ensure that each carrier's cost allocation manual reflects the carrier's new ventures and changes in the carrier's accounting for its existing ventures."<sup>2</sup> Sprint agrees with the Commission that this constitutes a valid reason for continuing the notice requirement. Furthermore, nothing in Section 402(b)(2)(B) minimizes the need for such help or explicitly requires that the 60 day notice be eliminated.

Indeed, keeping the 60 notice requirement is more in keeping with the 1996 Act's "de-regulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications."<sup>3</sup> As the Commission notes, the alternative to the 60 day notice provision is a waiver process or no changes in between annual filings. Neither of these alternatives is of a "de-regulatory" nature and neither will accelerate deployment of advanced telecommunications.

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2. ONPRM at para. 21.

3. ONPRM at para. 1.

Both of these alternatives are likely to be more protracted than the 60 day notice provision and the inability to implement changes for a year will certainly not foster competition. Additionally, the waiver process will be more burdensome on both the Commission and the industry. Accordingly, the current 60 day notice provision in Section 69.903(b) must be retained.

Finally, the Commission also proposed changes to Section 43.21 of the Commission's Rules dealing with the reports to be filed by certain common carriers. The proposed changes add new paragraphs (g), (h), (i), (j) and (k), each of which requires a report to be filed to capture and reflect specific data.<sup>4</sup> These new proposed rules should be modified to reference the specific ARMIS report number that the carrier is to use. For instance, it appears that the required information in 43.21(g) should be reflected on Form 43-05 and the required information in 43.21(h) should be reflected on Form 43.06, however it is not entirely clear. Adding clarity by specifying the specific form to be used will help streamline the ARMIS reporting process and enable the

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4. Section 43.21(f) is not new, but slightly revised. Even though this rule is not new, it too can be clarified by adding a reference to the specific ARMIS report.

Commission and the carriers to do their respective jobs in a more efficient manner.

Respectfully submitted,

SPRINT CORPORATION

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October 15, 1996

## **CERTIFICATE OF SERVICE**

I, **Melinda L. Mills**, hereby certify that I have on this 15<sup>th</sup> day of October, 1996, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of Sprint Corporation" in the Matter of Implementation of the Telecommunications Act of 1996, Reform of Filing Requirements and Carrier Classifications, CC Docket No. 96-193, filed this date with the Acting Secretary, Federal Communications Commission, to the persons on the attached service list.

  
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